

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: MAXIMUS III PROPERTIES, LLC) CASE NO. 17-41723
DEBTOR) CHAPTER 7
) JUDGE KAY WOODS
) MOTION TO SELL DEBTOR'S
) INTEREST IN REAL ESTATE
)

Now comes Richard G. Zellers, Trustee, by and through Counsel, and herein moves this Court for an Order authorizing him to sell the Debtor's interest in real estate commonly known as 650 Griswold, Warren, Ohio free and clear of all liens and encumbrances, and for reasons therefore states as follows.

The Debtor owns certain real estate as described above, which real estate has an auditor's value of \$351,000.00. However, as with all of the Debtor's property, it has been severely compromised, in that piping and electric have been stripped, and several of the utility pieces of equipment have been taken. The Trustee states that there are no secured creditors upon said property, however, there are real estate taxes, Bureau of Workers Compensation and ODJFS liens, all which will be satisfied out of the proceeds of sale in full.

The Trustee believes that the estate cannot bear the cost of security and utilities, and cannot obtain insurance due to the asbestos problems upon the property. The Trustee recommends that the real estate be sold at an online auction. The Trustee believes this is in the best interest of the bankruptcy estate and of the creditors thereof, and therefore, requests an Order of this Court authorizing the Trustee to sell said real estate free and clear of all liens and encumbrances, with all liens and encumbrances

being transferred to the proceeds, and for other and further relief as the Court deems equitable.

Respectfully submitted,

/s/Richard G. Zellers
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CERTIFICATE OF SERVICE

I certify that on the 30th day of January, 2018 a true and correct copy of the Motion was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Michael A. Partlow, partlowlaw@aol.com

And by regular U.S. mail, postage prepaid, on:

Office of the United States Trustee
Howard M. Metzenbaum U.S. Courthouse
201 Superior Ave., Room 441
Cleveland, OH 44114

John Monroe, Esq.
North Point Tower
1001 Lakeside Ave., Suite 1400
Cleveland, OH 44114

/s/Richard G Zellers
RICHARD G. ZELLERS